

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|--|---|---------------|
| ERNESTINE BROWN, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | No. 07 C 6634 |
| |) | |
| WILL COUNTY SHERIFF DEPARTMENT and |) | |
| WILL COUNTY SHERIFF PAUL J. KAUPAS, |) | |
| in his official capacity, Unknown WILL |) | |
| COUNTY ADULT DETENTION FACILITY |) | |
| HEALTH CARE PROVIDERS, and Unknown |) | |
| WILL COUNTY ADULT DETENTION |) | |
| FACILITY CORRECTIONAL OFFICERS, |) | |
| |) | |
| Defendants. |) | |

**DEFENDANT'S MOTION FOR ENLARGEMENT OF TIME TO
ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendants Will County Sheriff's Department and Will County Sheriff Paul J. Kaupas, in his official capacity, by their attorneys, Querrey & Harrow, appointed as Special State's Attorney, and move this Court for an enlargement of time to answer or otherwise plead. In support, defendants states as follow:

1. Defendants in this matter have recently retained QUERREY & HARROW, LTD., as their attorneys.
2. Plaintiff provided defendants with a Waiver of Service Summons on November 27, 2007; therefore, defendant must answer or otherwise plead by January 27, 2008.

3. Plaintiff's complaint makes multiple claims, including constitutional violations under § 1983 for denial of medical care, negligence, and intentional infliction of emotional distress.
4. As the undersigned has only recently been retained to handle the above-captioned matter and is attempting to gather information in order to file a responsive pleading.
5. The others parties will not be prejudice if Defendants, Will County Sheriff's Department and Will County Sheriff Paul J. Kaupas, are granted an enlargement of time to answer or otherwise plead.

WHEREFORE DEFENDANTS PRAY:

1. That this Honorable Court grant an enlargement of time up to and including February 26, 2008 for Defendants to answer or otherwise plead;
2. That this Honorable Court vacate any default, technical or otherwise;
3. That this Honorable Court grant any other relief it deems just.

Respectfully submitted,

By: s/Daniel F. Gallagher
One of the Attorneys for Defendant,
WILL COUNTY SHERIFF'S DEPARTMENT,
PAUL J. KAUPAS, SHERRIF OF WILL COUNTY,
in his official capacity.

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